

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19-CV-767-ECM
)	
HYUNDAI MOTOR)	
MANUFACTURING, ALABAMA,)	
LLC; HYUNDAI ENG AMERICA,)	
INC.; and DYNAMIC SECURITY,)	
INC.)	
)	
Defendants.)	

EXHIBIT “E” TO

PLAINTIFF’S OBJECTIONS TO HYUNDAI ENG AMERICA’S

DEPOSITION DESIGNATIONS

KRISTAL RIDDLE

Case	Key, Davita
Issue Code	HEA Designation

RIDDLE, KRISTAL 8/19/22 VOL 1		
1	031:05 - 031:07	031:05 Is everyone that's hired for Dynamic 06 Security considered a security officer? 07 A. Yes.
2	032:22 - 033:02	032:22 Q. So Ms. Key worked in a mail room. 23 Would she, for purposes of Dynamic Security, be 033:01 considered a security officer? 02 A. Yes.
3	067:14 - 067:16	067:14 Q. And who would have made the 15 determination as to whether to hire? 16 A. Gloria Robinson and Ray Cureton.
4	077:20 - 078:09	077:20 Q. Can you tell me -- can you list for 21 me every individual who supervised Ms. Key? 22 A. No, I can't. 23 Q. Okay. Can you list for me who you 078:01 know supervised Ms. Key? 02 MR. MILLER: Object to the form. 03 A. I know Ms. Key was supervised by 04 Gloria Williams. She was the project manager 05 on the ground at HMMA. 06 Q. Okay. You said Gloria Williams. Did 07 you mean Cassandra Williams or Gloria Robinson? 08 A. I meant Gloria Robinson. 09 Q. Okay.
5	082:16 - 082:20	082:16 Plaintiff's Exhibit 20 to Dynamic Security 17 related to mail room duties and 18 responsibilities? 19 MR. MILLER: Object to the form. 20 MS. BROWN: Object to the form.
6	083:07 - 083:12	083:07 Q. Is it your understanding that Dynamic 08 Security employees in 2017 worked in the mail 09 room at Hyundai? 10 A. We did have Dynamic Security 11 employees who would be assigned to the mail 12 room.
7	141:06 - 141:06	141:06 MR. MILLER: Object to the form.

8	154:02 - 154:09	<p>154:02 Q. And at the heading it says, Dynamic</p> <p>03 Security, Inc. Job Description, Job Title:</p> <p>04 Security Officer; do you see that?</p> <p>05 A. I do.</p> <p>06 Q. Is this the job title -- the job</p> <p>07 description that would have been applicable to</p> <p>08 Ms. Key?</p> <p>09 A. It would.</p>
9	197:07 - 197:09	<p>197:07 Q. And for the record, Ms. Key was</p> <p>08 directly employed by Dynamic; correct?</p> <p>09 A. Correct.</p>
10	199:02 - 199:20	<p>199:02 Q. Do you have any first-hand knowledge</p> <p>03 of any of the events pertaining to Ms. Key or</p> <p>04 her employment?</p> <p>05 A. No.</p> <p>06 Q. Okay. So today when you were</p> <p>07 testifying, you were asked about these</p> <p>08 documents which refer to Ms. Key, and you</p> <p>09 testified in response to questions about those</p> <p>10 documents. You were simply reading the</p> <p>11 document stating what you think it said based</p> <p>12 on the text of the document or offering your</p> <p>13 opinion; correct?</p> <p>14 A. That is correct.</p> <p>15 Q. Your testimony wasn't based on any of</p> <p>16 your own personal knowledge about what was</p> <p>17 meant in the document or what any of the people</p> <p>18 who were drafting the documents saw or meant;</p> <p>19 correct?</p> <p>20 A. That is Correct.</p>
11	204:21 - 204:21	<p>204:21 MR. MILLER: Object to the form.</p>